

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CAROLYN GREENE, Individually and On Behalf of)
All Others Similarly Situated,)
Plaintiff,) Civil Docket for Case No.:
v.) 1:03-CV-12628-NG
BIOPURE CORPORATION, THOMAS A. MOORE,) Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICHARDS,)
Defendants.)
x

(Additional captions on following pages)

DECLARATION OF CHRISTOPHER KELLER IN SUPPORT OF MOTION
OF THE BHASKAR GROUP FOR CONSOLIDATION OF RELATED ACTIONS,
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF PROPOSED
LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL

JOHN G. ESPOSITO, On Behalf of Himself and All Others Similarly Situated, Plaintiff, v. BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS, Defendants.

MICHAEL E. CRIDEN, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. BIOPURE CORPORATION, THOMAS A. MOORE and CARL W. RAUSCH, Defendants.

JOSEPH L. KING, On Behalf of Himself and All Others Similarly Situated, Plaintiff, v. BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS, Defendants.

ISRAEL SHURKIN and SIARON SHURKIN, Individually and On Behalf of All Others Similarly Situated,)	x	
	Plaintiff,)	Civil Docket for Case No.: 1:04-CV-10055-NG
v.))	
))	Hon. Nancy Gertner
BIOPURE CORPORATION, THOMAS A. MOORE and CARL W. RAUSCH,))	
	Defendants.)	
)	x	
JAMES J. NIZZO, VIRGINIA C. NIZZO and CARLO CILBERTI, On Behalf of Themselves and All Others Similarly Situated,))	Civil Docket for Case No.: 1:04-CV-10065-NG
	Plaintiff,)	
))	
v.))	Hon. Nancy Gertner
BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,))	
	Defendants.)	
)	x	
BARRY BROOKS,))	
	Plaintiff,)	Civil Docket for Case No.: 1:04-CV-10077-NG
))	
v.))	
BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,))	Hon. Nancy Gertner
	Defendants.)	
)	x	

ANASTASIOS PERLEGIS, Individually and On Behalf of)
All Others Similarly Situated,)
Plaintiff,) Civil Docket for Case No.:
) 1:04-CV-10078-NG
v.)
BIOPURE CORPORATION, THOMAS A. MOORE,) Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICHARDS,)
Defendants.)
MARTIN WEBER, On Behalf of Himself and All Others)
Similarly Situated,)
Plaintiff,) Civil Docket for Case No.:
) 1:04-CV-10090-NG
v.)
BIOPURE CORPORATION, THOMAS A. MOORE,) Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICHARDS,)
Defendants.)
BRUCE HAIMS, Individually and On Behalf of)
All Others Similarly Situated,)
Plaintiff,) Civil Docket for Case No.:
) 1:04-CV-10144-NG
v.)
BIOPURE CORPORATION, THOMAS A. MOORE,) Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICHARDS,)
Defendants.)

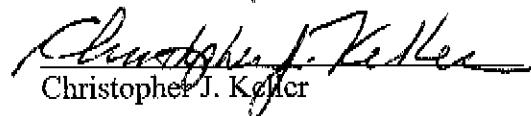
MODEL PARTNERS LIMITED, Individually and On
Behalf of All Others Similarly Situated,)
Plaintiff,) Civil Docket for Case No.:
v.) 1:04-CV-10155-NG
BIOPURE CORPORATION, THOMAS A. MOORE,) Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICHARDS,)
Defendants.)
x

W. KENNETH JOHNSON, On Behalf of Himself and All)
Others Similarly Situated,)
Plaintiff,) Civil Docket for Case No.:
) 1:04-CV-10190-NG
)
v.)
)
BIOPURE CORPORATION, THOMAS A. MOORE,) Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICHARDS,)
)
Defendants.)
)
NANCY L. PINCKNEY and GERTRUDE PINCKNEY,)
Individually and On Behalf of All Others Similarly)
Situated,) Civil Docket for Case No.:
) 1:04-CV-10189-NG
Plaintiff,)
)
v.) Hon. Nancy Gertner
BIOPURE CORPORATION, THOMAS A. MOORE and)
CARL W. RAUSCH,)
)
Defendants.)
)
GREGORY KRUSZKA, On Behalf of Himself and All)
Others Similarly Situated,) Civil Docket for Case No.:
) 1:04-CV-10202-NG
Plaintiff,)
)
v.)
)
BIOPURE CORPORATION, THOMAS A. MOORE,) Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICHARDS,)
)
Defendants.)
)

CHRISTOPHER KELLER hereby declares as follows:

1. I am an associate with the law firm of Goodkind Labaton Rudoff & Sucharow LLP, counsel for the Bhaskar Group ("Movant").
2. I respectfully submit this declaration in support of Movant's motion for consolidation of the related actions, appointment of Movant as Lead Plaintiff and approval of the selection of the firm of Goodkind Labaton Rudoff & Sucharow LLP as Lead Counsel.
3. Annexed hereto as Exhibit A is a true and correct copy of the Certification of Michael Lane, Certification of William Bhaskar, and Certification of Kenneth Isherwood.
4. Annexed hereto as Exhibit B is a true and correct copy of the December 30, 2003 notice announcing the filing of a class action against Biopure Corporation.
5. Annexed hereto as Exhibit C is a true and correct copy of the firm resume of Goodkind Labaton Rudoff & Sucharow LLP.

I declare, under penalty of perjury, this 1st of March, 2004.



Christopher J. Keller